

EXHIBIT A

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
-----x

3 E. JEAN CARROLL,

4 Plaintiff,

New York, N.Y.

5 v.

22 Civ. 10016 (LAK)

6 DONALD J. TRUMP,

7 Defendant.
-----x

Jury Trial

8 May 4, 2023
9 10:00 a.m.

10 Before:

11 HON. LEWIS A. KAPLAN,

12 District Judge
13 and a Jury

14 APPEARANCES

15 KAPLAN HECKER & FINK LLP
16 Attorneys for Plaintiff
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30 W. PERRY BRANDT
31 Attorney for Defendant

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Martin - Direct

1 A. Yes.

2 Q. What would you, generally speaking, what would you do
3 together outside of work?

4 A. We did regular aging women things. That's the way I like
5 to describe it. We had lots of lunches, we saw movies
6 together, we went to comedy clubs. We did things that were
7 enjoyable to both of us.

8 Q. And during this period when America's Talking was in
9 operation, how would you characterize your friendship with
10 Ms. Carroll?

11 A. Close. It was a close friendship, and on certain levels we
12 kept growing closer.

13 Q. And is your friendship still like that today?

14 A. I believe so. I hope so.

15 Q. Now, Ms. Martin, did there come a time when Ms. Carroll
16 told you about something that had happened to her with
17 Mr. Trump at Bergdorf Goodman?

18 A. Yes.

19 Q. And tell me -- I'm going to take this piece by piece, if we
20 can, but tell me what you remember when that first happened.

21 A. It was an ordinary day, I would say. I don't remember the
22 day of the week exactly, but we were finishing with our shows
23 after a regular day, I think it was after E. Jean's show
24 because she asked if I was doing anything and could we hang out
25 for a moment at my house.